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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
POUGHKEEPSIE DIVISION**

-----x
In re:

Chapter 7

BRADLEY C. REIFLER,

Case No. 17-35075 (CGM)

Debtor.

-----x
RODNEY OMANOFF,

Plaintiff,

Adversary Proceeding

vs.

No. 22-09002 (CGM)

BRADLEY C. REIFLER, FOREFRONT
PARTNERS, LLC, TALKING CAPITAL
WINDUP LLC, TALKING CAPITAL
PARTNERS II, LLC, TALKING CAPITAL
PARTNERS III, LLC, BOWLES & JOHNSON
PLLC, DAVID K. BOWLES, ESQ.,
MARGARETT A. JOHNSON, ESQ.,
WILLIAM T. MCKETTRICK,
JOHN OR JANE DOES (1-10), and ABC
ENTITIES (1-10),

Defendants.

-----x

NOTICE OF APPEAL

TO: Clerk, United States Bankruptcy Court
For the Southern District of New York

PLEASE TAKE NOTICE that plaintiff Rodney Omanoff, by though and his undersigned attorney, pursuant to Title 28 of the United States Code, section 158(a)(1), and Federal Rules of

Bankruptcy Procedure 8001 *et seq.*, hereby appeals from (1) the Order and Decision of the United States Bankruptcy Court for the Southern District of New York (Honorable Cecelia G. Morris, United States Bankruptcy Judge), signed on July 14, 2022 and docketed as ECF Document No. 161 in the within bankruptcy adversary proceeding on July 14, 2022 and (2) the Order and Decision of the United States Bankruptcy Court for the Southern District of New York (Honorable Cecelia G. Morris, United States Bankruptcy Judge), signed on August 19, 2022 and docketed as ECF Document No. 172 in the within bankruptcy adversary proceeding on August 19, 2022. True and correct copies of the Orders and Decisions appealed from are annexed hereto as composite **Exhibit A.**

This appeal is made pursuant to Federal Rules of Bankruptcy Procedure 8002 and 8003.

Please take notice that the parties to within matter, and the names and addresses of their respective counsel (if applicable) are as follows:

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David K. Bowles, Esq.
BOWLES & JOHNSON PLLC
Attorneys for Defendants David K. Bowles, Forefront Partners, LLC, Margaret A. Johnson, Talking Capital Partners II, LLC, Talking Capital Partners III, LLC, and Talking Capital Windup LLC
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PLEASE TAKE FURTHER NOTICE that the undersigned hereby affirms, pursuant to Title 28 of the United States Code, Section 1746, that the filing of the within Notice of Appeal is timely pursuant to Federal Rule of Bankruptcy Procedure 8002.

Dated: Roseland, New Jersey
September 2, 2022

Respectfully submitted,

By: /s/ Scott H. Bernstein
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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: BRADLEY C. REIFLER,) Chapter 7
Debtor.) Case No. 17-35075 (CGM)
RODNEY OMANOFF,)
Plaintiff,)
- against -) Adv. Proc. No. 22-09002 (CGM)
BRADLEY C. REIFLER, FOREFRONT)
PARTNERS, LLC, TALKING CAPITAL)
WINDUP LLC, TALKING CAPITAL)
PARTNERS II, LLC, TALKING CAPITAL)
PARTNERS III, LLC, BOWLES & JOHNSON)
PLLC, DAVID K. BOWLES, ESQ.,)
MARGARETT A. JOHNSON, ESQ.,)
WILLIAM T. MCKETTRICK,)
JOHN OR JANE DOES (1-10), and ABC)
ENTITIES (1-10),)
Defendants.)

**ORDER GRANTING MOTION TO DISMISS AND DENYING MOTION TO
DISQUALIFY COUNSEL**

Upon consideration of the motion to dismiss the current adversary proceeding (Adv. Proc. No. 22-09002 (CGM)), brought by defendants Forefront Partners, LLC, Talking Capital Windup LLC, Talking Capital Partners II, LLC, Talking Capital Partners III, LLC, Bowles & Johnson PLLC, David K. Bowles, Esq., Margarett A. Johnson, Esq., and William T. McKettrick (together the “Defendants”) (Dkt. 82), and the opposition to said motion by plaintiff Rodney Omanoff (“Plaintiff”), and all memoranda of law, declarations, and exhibits submitted in support of said pleadings, and

Upon consideration of the motion to disqualify Bowles & Johnson PLLC, David K. Bowles, Esq., and Margarett A. Johnson, Esq. (together the “Attorney Defendants”) (Dkt. 91), and the opposition to said motion by the Attorney Defendants, and all memoranda of law, declarations, and exhibits submitted in support of said pleadings, and

Upon hearing the arguments of counsel for Plaintiff and Defendants on July 12, 2022, and upon all proceedings had before the Court and after due deliberation, and good and sufficient cause existing therefore, for the reasons stated on the record on July 12, 2022:

IT IS HEREBY ORDERED THAT:

1. The motion to dismiss the adversary proceeding in its entirety, with prejudice (Dkt. 82) is hereby **GRANTED**; and
2. The motion to disqualify the Attorney Defendants (Dkt. 91) is hereby **DENIED AS MOOT**.

Dated: July 14, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
U.S. Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: BRADLEY C. REIFLER,) Chapter 7
Debtor.) Case No. 17-35075 (CGM)
RODNEY OMANOFF,)
Plaintiff,)
- against -) Adv. Proc. No. 22-09002 (CGM)
BRADLEY C. REIFLER, FOREFRONT)
PARTNERS, LLC, TALKING CAPITAL)
WINDUP LLC, TALKING CAPITAL)
PARTNERS II, LLC, TALKING CAPITAL)
PARTNERS III, LLC, BOWLES & JOHNSON)
PLLC, DAVID K. BOWLES, ESQ.,)
MARGARETT A. JOHNSON, ESQ.,)
WILLIAM T. MCKETTRICK,)
JOHN OR JANE DOES (1-10), and ABC)
ENTITIES (1-10),)
Defendants.)

ORDER DENYING MOTION FOR RECONSIDERATION

Upon consideration of the Motion of Plaintiff Rodney Omanoff for Reconsideration of the Portion of the Court's July 14, 2022 Order Granting the Amended Motion to Dismiss with Respect to Counts III and IV of Plaintiff's Verified Amended Complaint in the current adversary proceeding (Adv. Proc. No. 22-09002 (CGM)), brought by plaintiff Rodney Omanoff ("Plaintiff") (Dkt. 166), the opposition to said motion by defendants Forefront Partners, LLC, Talking Capital Windup, LLC, Talking Capital Partners II, LLC, Talking Capital Partners III, LLC, David K. Bowles, Esq., and Margarett A. Johnson, Esq. (Dkt. 168), the opposition to said

motion by defendant Bowles & Johnson, PLLC (Dkt. 167), and all memoranda of law, declarations, and exhibits submitted in support of said pleadings, and

Upon the record and all proceedings had before the Court and after due deliberation, and good and sufficient cause existing therefore, for the reasons stated on the record on August 16, 2022:

IT IS HEREBY ORDERED THAT:

1. The motion for reconsideration (Dkt. 166) in its entirety is hereby **DENIED**.
2. This Court has and shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

**Dated: August 19, 2022
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**